

EXHIBIT “A”

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VIA E-MAIL ONLY
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Joseph T. Bambrick, Jr., Esquire
529 Reading Avenue, Suite K
West Reading, PA 19611

Re: Lidely D. Morel (Bankruptcy No. 24-12980(PMM))
Shubert v. Morel (Adversary No. 24-00147(PMM))

Dear Mr. Bambrick:

As you are aware, my firm is counsel to Christine C. Shubert in her capacity as the Chapter 7 Trustee for the estate of Lidely D. Morel and the plaintiff in connection to the above-referenced adversary proceeding (the “Plaintiff”). In accordance with the terms of the Pretrial Order dated January 28, 2025 (the “Pretrial Order”), you were required to file and serve the disclosures under Fed. R. Civ. P. 26(a)(3) (the “Disclosures”) on behalf of Manuel M. Morel (the “Defendant”) on or before April 8, 2025.

That being said, you have failed to file or serve the Disclosures in accordance with the terms of the Pretrial Order. As such, if you do not file and serve the Disclosures on or before April 11, 2025, the Plaintiff will file a Motion to Compel the Disclosures and request sanctions against in the Defendant in accordance with Fed. R. Civ. P. 37(a).

Please be guided accordingly.

Very truly yours,



ROBERT W. SEITZER

RWS/jh

cc: Christine C. Shubert, Esquire (via e-mail only)